

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

Case No. 1:22-cr-00096-7-CKK

LAUREN HANDY
JONATHAN DARNEL
JAY SMITH (AKA JUANITO PICHARDO)
PAULA "PAULETTE" HARLOW
JEAN MARSHALL
JOHN HINSHAW
HEATHER IDONI
WILLIAM GOODMAN and
JOAN BELL, and
HERB GERAGHTY

Defendants.

DEFENDANT, HEATHER IDONI'S, PROPOSED
INSTRUCTION ON DEFINITION OF "INTIMIDATION BASED
ON 18 USC SEC. 248 (3) (e) (4)

The term "intimidate" means to place a person in reasonable apprehension of
bodily harm.

Dated: July 26, 2023

Respectfully submitted,
/s/ ROBERT J. DUNN, P33726
ROBERT J. DUNN, P33726
Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that Defendant's Amended Proposed Instruction on Definition of "Intimidation" Based on 18 USC Sec. 248 (3) (e) (4) and Certificate of Service was electronically filed on this date with the Clerk of the Court and all the parties of the case by Robert J. Dunn's office, Attorney for Defendant and emailed to Heather Idoni.

DATED: July 26, 2023

/s/CYNTHIA L. EIGNER
CYNTHIA L. EIGNER
Legal Assistant to Robert J. Dunn